

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

**JESSICA JONES, et al.,**

Plaintiffs,

v.

**VARSITY BRANDS, LLC, et al.**

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

**JURY DEMAND**

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**DECLARATION OF AMY COULSON IN SUPPORT OF PLAINTIFFS' UNOPPOSED  
MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT**

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I, Amy Coulson, declare the following under penalty of perjury:

1. I am over the age of eighteen and I am competent to make this declaration.
2. I respectfully submit this declaration in support of Plaintiffs' Motion for Preliminary Approval of Settlement. Each of the facts set forth below is true and correct and is within my personal knowledge. If called and sworn as a witness, I would competently testify thereto. As to matters of opinion and belief, I believe them to be true and accurate.
3. I am a resident of the State of Tennessee.
4. I am a registered nurse. I have three daughters who have all participated in competitive cheer, with the oldest starting in 2013. At times during the last 11 years I have worked a second job in order to pay for my daughters' cheer activities. All of the income from my second job has been used to pay for competitive cheerleading activities, including paying for Varsity cheer competitions, camps, and apparel.
5. My oldest daughter competed in All Star Cheer from 2013 to 2021. She attended a private cheer gym called Memphis Elite for 4 years, from 2013 to 2017, which cost between

approximately \$200 and \$300 per month to pay for coaching and facilities. She then switched to a gym called Memphis Pride, where she continued for 4 more years, at a cost of between approximately \$200 and 300 per month for coaching and facilities.

6. My second daughter has competed in All Star Cheer since 2014. She attended Memphis Elite until 2016, which cost between approximately \$200 and \$300 per month. She attended Memphis Pride after that, which cost approximately \$200 to 300 per month to pay for coaching and facilities. She has also competed for her school team for 4 years, at a cost of approximately \$400 per month. Varsity summer camp is mandatory for the school team.

7. My third daughter has competed in All Star Cheer since 2016. She attended Memphis Elite for a few months, at a cost of approximately \$150 per month, then switched to Memphis Pride, which cost approximately \$200 to 300 per month. She has also competed for her school team since 2022, at a cost of approximately \$400 per month for coaching and facilities. Varsity summer camp is mandatory for the school team.

8. In addition to the monthly fees for the gyms, I had to pay additional funds to attend 6-10 competitions per year for each of my three daughters, including Varsity competitions. The cost of attending these competitions varied, but included entrance fees, spectator fees, press pass to take photos of the team, and the costs of travel and food.

9. In addition, I paid between approximately \$140 and \$500 per night for hotel rooms at tournaments for which we traveled out of town. At some of the Varsity events I attended, including the UCS National Championships at Walt Disney World (described in more detail in the next paragraph), I was required to stay at the hotels Varsity specified, as part of what I and other parents referred to as “stay to play.”

10. We attended Varsity’s Summit end-of-year championship tournaments for All Star cheer at the Walt Disney World Resort near Orlando, Florida, in 2018 and 2019. We also attended Varsity’s UCA High School National Championship at the Walt Disney World Resort in 2023 and 2024. My second daughter’s high school team won the UCA Nationals this year. For each of

these tournaments, I paid \$2,000 for four nights at the hotel that Varsity required us to stay in, plus a required \$180-200 park-hopper fee to pay for entry to Disney World for each of my daughters, and a \$40-45 spectator fee for me to get into the competition, among other costs.

11. We have also attended the USASF Cheerleading Worlds at the Walt Disney World Resort in 2023 and 2024.

12. For every year that my two younger daughters competed in school cheer, I have paid between \$75 and \$125 for them to attend Varsity cheer camp, which is a prerequisite for competing in Varsity's national championships, which the team competes in every year.

13. I have purchased new Varsity uniforms for each of my daughters approximately every 2 to 3 years, at a cost of approximately \$350 to \$480 per uniform. I also purchased Varsity shoes in some years, at a cost of approximately \$110 to \$120 per pair.

14. For the 2023-2024 season, our All-Star gym required us to buy new Varsity uniforms. We have asked in the past to get Rebel uniforms but were told that the Varsity judges would be punitive if we did. Our All-Star gym has also required us to attend a high number of Varsity competitions during this season in order to qualify for a discount on the uniforms.

15. A number of years ago, I learned from a friend who owned an All Star gym that she earned kickbacks from Varsity if the team attended a certain number of Varsity competitions and purchased Varsity uniforms. I do not know if the gyms I attended also receive kickbacks from Varsity. I do know that I never received a refund or reimbursement from the gyms.

16. I have never been a plaintiff in a class action lawsuit before this case. I have preserved all documents and communications that could be relevant to the case, and I have produced documents to my attorneys.

17. I am not being paid anything to be a named plaintiff in this case. I understand that if there is a successful outcome in the case, whether at trial or through settlement, a Court might award me with a service fee for agreeing to be a named plaintiff. But I did not agree to be a named plaintiff for money in any way. I did it because I believe Varsity takes advantage of their

size and charges families like mine more than they should.

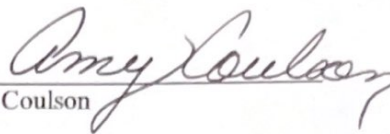
18. I am fully committed to the prosecution of this case, and would testify at my deposition and at trial, if either becomes necessary.

19. I provided my files and data to my attorneys to comply fully with discovery in this matter.

20. I understand that as a class representative, I may be responsible for participating in giving notice to the classes if the class is certified, and I am willing to do so.

21. I seek nothing other than to further the best interests of the class, and am fully willing to give my time and energy to do so through resolution.

22. I declare under penalty of perjury that the foregoing is true and correct. Executed on May 13, 2024 in Arlington, Tennessee.

/s/   
Amy Coulson